

REMARKS/ARGUMENTS

The Office Action of March 4, 2009, and the Advisory Action of July 10, 2009, have been carefully reviewed and this amendment is responsive thereto. Claims 1-3, 5, 6, 8-10, and 19-21 have been amended. No claims have been canceled. Claims 7 and 14 were previously canceled. Claims 1-6, 8-13, and 15-24 therefore remain pending. Reconsideration and allowance of the application are respectfully requested.

Claim Rejections Under 35 U.S.C. § 103

Claims 1, 2, 8, 9, 15, 16, 19 and 22-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,870,683 ("Wells") in view of Reference Manual for the TNT Products ("TNT").

Claims 3, 4, 10, and 11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wells in view of TNT and further in view of alleged admitted prior art.

Claims 5, 12, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wells in view of TNT and further in view of Bickmore (Web Page Filtering and Re-Authoring for Mobile Users).

Claims 6, 13, 17, 18 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Wells in view of TNT and Bickmore, and further in view of GCSPH and GCSPM.

Applicants respectfully traverse.

While Applicants maintain that the claims were allowable over the cited references prior to this amendment, in order to advance prosecution of this case Applicants have amended all independent claims to clarify that the claims refer to a time-based sequence of images, i.e., an animation, and not a repeated pattern shown within a single image, as is described in TNT. That is, as previously argued, TNT is not usable with a time-based *sequence* of images, as claimed. TNT is only usable to edit a *repeating pattern within a single image*, not for editing multiple images in a time-based sequence of images. This is evident from TNT's use and description of BMP (bitmap) and ICO (icon) files, neither of which are capable of representing an animation or a time-based sequence of images, as claimed. This is also apparent from the description in TNT

of a single bitmap pattern repeated within the same image. By way of illustration, TNT is usable to edit an image repeated a number of times in a single frame, e.g., as shown below:



TNT, 11.2.4.2.4, Sample Pattern panel

In contrast to the above, the claimed invention is usable for editing a time-based sequence of images displayed in a predetermined order and with *predetermined time intervals between the images*, e.g., as shown in Fig. 4 of the present application:

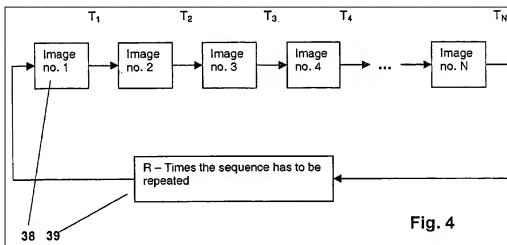


Fig. 4

Therefore, notwithstanding the propriety of a combination of Wells and TNT (which Applicants do not concede), the combination still would not teach or suggest the features of any independent claim because the combination would only be capable of editing a single image, not the claimed time-based sequence of images.

The remaining dependent claims are allowable at least based on the allowability of their respective base claims, and further in view of the additional features recited therein, because the additionally cited art does not cure the aforementioned deficiencies in Wells and/or TNT.

CONCLUSION

Based on the foregoing, Applicants respectfully submit that this application is in condition for allowance and request notice of same.

Respectfully submitted,

BANNER & WITCOFF, LTD.

Date: August 4, 2009

By: /Ross Dannenberg/
Ross A. Dannenberg
Reg. No. 49,024
1100 13th Street, N.W.
Suite 1200
Washington, D.C. 20005-4051
Tel: (202) 824-3000
Fax: (202) 824-3001